

EXHIBIT 4

From: Shipman, Joseph C (Legal Affairs) <jcshipman@liberty.edu>

Sent: Friday, March 17, 2023 10:25 AM

To: King, Jeremy <JKing@hunton.com>

Cc: Jenkins, Robin E (Legal Affairs) <rjenkins22@liberty.edu>; hannon@rakness-wright.com; Mast, Richard L <rlmast@liberty.edu>

Subject: Baby Doe v. Joshua Mast et al - Subpoena for Documents

Caution: This email originated from outside of the firm.

Mr. King:

Robin Jenkins and I represent Liberty University in connection with your Subpoena dated March 10, 2023 (also attached). A copy of this was served on LU earlier this week.

Please note that Liberty objects to the subpoena for the following reasons: (1) it is issued out of the wrong court, (2) it does not provide a reasonable time to comply, and (3) without limiting search terms, it subjects the university to an undue burden.

Liberty will forgo filing a motion to quash if your team: (1) re-issues the subpoena from the correct court (just send to my attention—we'll waive service on the corrected subpoena), (2) give us more time to comply, and (3) provide us with search terms that will allow us to narrow down our searches. Also, on a subpoena issued in the related state court case, the Masts objected to some of the requests under attorney-client privilege. The Masts and plaintiffs in that case agreed that LU should exclude email communications from/to certain email accounts. I don't know if the Masts will raise similar objections, but suspect they will. In the interest of moving things along, LU would propose that we furnish you with the documents we produced in the state case, then work with you to develop search terms for other records you request in your subpoena.

I propose a conference call to discuss these matters. Are you available next Monday afternoon, Wednesday afternoon, or Thursday afternoon to discuss? Please let me know a day/time works for you.

Best,

J. Court Shipman
Senior Counsel
Office of Legal Affairs

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